

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Twana Ahmed,

Plaintiff,

V.

Universal Protection Service, LP, d/b/a
Allied Universal Security Services,

Defendant.































No. 4:23-cv-02823

Jury Demanded

UNOPPOSED MOTION TO EXTEND THE SUMMARY JUDGMENT RESPONSE AND REPLY DEADLINES

I. NATURE AND STAGE OF PROCEEDING

This case concerns the civil rights of workers. It involves claims of discrimination and retaliation under Title VII of the Civil Rights Act of 1964, the Civil Rights Act of 1886 as revised and amended in 42 U.S.C. § 1981, and the Texas Commission on Human Rights Act (TCHRA) under Texas Labor Code Chapter 21.

This motion seeks to extend through January 22, 2025 the deadline to file a response to Defendant's Motion for Summary Judgment. [ECF Doc. No. 27]. The current response deadline is January 10, 2025. [ECF Doc. No. 29]. To be fair to defense and honor our agreement on this issue, this motion also seeks to extend the current reply brief deadline through February 21, 2025.

II. RELEVANT FACTS

Defendant does not oppose the relief requested in this motion. Plaintiff Twana Ahmed, through his counsel, seeks to extend through January 22, 2025 the deadline to file a response to Defendant's Motion for Summary Judgment. [ECF Doc. No. 27]. The current response deadline is January 10, 2025. [ECF Doc. No. 29]. Lead counsel, Amanda Hernandez's family has been repeatedly sick for the past several weeks. In particular, lead counsel's young daughter has been sick with an undiagnosed illness. This has resulted in several doctor's visits and an emergency room visit. Lead counsel has been focused on taking care of her daughter and has not been able to work as she originally intended.

The current reply deadline is January 31, 2025. [ECF Doc. No. 29]. To be fair to defense and honor our agreement on this issue, this motion also seeks to extend the current reply brief deadline through February 21, 2025. The reply deadline extension would account for defense counsel's scheduled time out of office from February 5, 2025 through February 10, 2025, and depositions scheduled through the balance of that week.

III. ISSUE AND STANDARD

The issue before the court is whether to grant an unopposed request to extend the summary judgment response deadline and reply deadline.

The Court may extend the summary judgment response and reply deadlines for good cause under Federal Rule of Civil Procedure 6(b)(1)(a).

IV. ARGUMENT

The Court may extend the summary judgment response and reply deadlines for good cause under Federal Rule of Civil Procedure 6(b)(1)(a).¹ As shown in the statement of relevant facts above, good cause is shown for the requested extensions of time.

V. RELIEF REQUESTED

For good cause shown above, Plaintiff Twana Ahmed—through undersigned counsel—respectfully requests that the Court extend the deadline to file a response to Defendant’s motion for summary judgment through and including January 22, 2025, and extend the deadline to file a reply brief through and including February 21, 2025.

Respectfully submitted,

/s/Amanda C. Hernandez

Amanda C. Hernandez

Attorney-in-charge

Texas State Bar No. 24064411

Southern District Bar No. 1531045

AH Law, PLLC

5718 Westheimer, Suite 1000

Houston, Texas 77057

T: (713) 588-4359

F: (281) 572-5370

amanda@ahfirm.com

¹ Federal Rule of Civil Procedure 6(b)(1)(a) states in relevant part:

(b) EXTENDING TIME.

(1) In General. When an act may or must be done within a specified time, the court may, for good cause, extend the time:

(A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires;

and

Amy E. Gibson
Of Counsel
Texas State Bar No. 00793801
Southern District Bar No. 20147
amy@gwfirm.com

David L. Wiley
Of Counsel
Texas State Bar No. 24029901
Southern District Bar No. 34134
david@gwfirm.com

Gibson Wiley PLLC
1500 Jackson Street #109
Dallas, Texas 75201-4923
T: (214) 522-2121
F: (214) 522-2126

Attorneys for Twana Ahmed

CERTIFICATE OF CONFERENCE

The undersigned certifies that she communicated with Defendant's counsel Nathan Shine about the relief requested in the motion and Mr. Shine informed her that Defendant did not oppose the requested relief in this motion.

/s/Amanda C. Hernandez
Amanda C. Hernandez

CERTIFICATE OF SERVICE

The undersigned certifies that on January 8, 2025, she filed the foregoing *unopposed motion* via the Court's CM/ECF system, accordingly effecting service on Defendant's attorneys of record.

/s/Amanda C. Hernandez
Amanda C. Hernandez